

April 4, 2023

via EM/CF

Jones
Law Firm P.C.

Honorable Jennifer L. Rochon
Daniel Patrick Moynihan
United States Courthouse
500 Pearl Street, Courtroom 20B
New York, NY 10007

Re: Response to Plaintiff's Pre-Motion Letter in *Coker v. Goldberg & Associates P.C.*, SDNY Case No. 21-cv-01803

Dear Judge Rochon:

On behalf of the Defendants, we are writing this letter in response to Plaintiff's Pre-Motion letter regarding Plaintiff's anticipated Motion for Summary Judgment, dated March 30, 2023.

Defendants plan to oppose Plaintiff's motion for summary judgment. Defendants' position regarding Plaintiff's role as an "executive assistant/personal assistant" is that it was indeed subject to the "administrative exemption" from overtime.

Defendants intend to establish that Plaintiff was given a sufficient amount of leeway and trust in performing her tasks, but Plaintiff repaid this trust and managerial leeway by shirking her duties and frolicking on company time, and lying on her timesheets. Defendants intend to establish that there is an issue of fact as to the number of hours Plaintiff actually worked for Defendants.

Defendants intend to establish the above through the completion of discovery. We thank the court for its time.

Respectfully,



T. Bryce Jones, Esq.
Jones Law Firm, P.C.
1270 6th Avenue, 7th Floor
New York, NY 10020
(212) 258-0685
bryce@joneslawnyc.com
Attorneys for Defendants